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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In Re:	:	Case No.: 19-21587 (MBK)
	:	
KURT N. KVIST,	:	Chapter: 13
	:	
Debtor.	:	CERTIFICATION IN OPPOSITION
	:	TO MOTION TO IMPOSE STAY
	:	
	:	

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Yoerys Fraga hereby certifies as follows:

1. My husband and I are creditors in the above captioned matter. I make this Certification in opposition to the Debtor's motion to impose the automatic stay.

2. My husband and I obtained a judgment in the Debtor's prior case declaring our claim in the total amount of \$216,609.00 to be non-dischargeable. The Debtor listed our debt as secured in the amount of \$50,000.00 in his schedules. Because we have not yet levied on any of the Debtor's assets our counsel has advised us that we are unsecured creditors.

3. Another creditor, Janis L. Doran, also obtained a non-dischargeable judgment against the Debtor in the prior case in the amount of \$154,577.25. It is my understanding that although

prior case, misrepresented the reason why the prior case was dismissed and lied about his income having increased. Clearly, the Debtor is not acting in good faith and his motion should be denied.

I hereby certify that the foregoing statements made be me are true. I understand that if any of the foregoing statements made by me are willfully false, I am subject to penalty of perjury.

  
Yoelys Fraga

Dated: July 1, 2019